

# EXHIBIT C

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13 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S AMENDED  
INITIAL DISCLOSURES**

Judge: Honorable William H. Alsup

Trial Date: October 10, 2017

**PRELIMINARY STATEMENT**

Pursuant to Federal Rules of Civil Procedure 26(a)(1), Defendants Uber Technologies, Inc. (“Uber”) and Ottomotto LLC (“Ottomotto”) (collectively, “Defendants”) hereby amend and supplement its initial disclosures to Plaintiff Waymo LLC.

Defendants provide these disclosures subject to and without waiving any applicable privilege, doctrine, or right, including without limitation the attorney-client privilege, the joint defense/common interest privilege, the work product doctrine, and all other rights and privileges recognized under the laws of the United States, the State of California, and all relevant jurisdictions. By these disclosures, Defendants do not concede the relevance or admissibility of any particular information. Defendants make these disclosures based on information currently available to them. Defendants reserve the right to amend or supplement these disclosures and to present additional evidence to support their defenses with any filing or during any proceeding in this action, including trial, in accordance with the Court’s Case Management Order (Dkt. 562).

**A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION  
[Fed. R. Civ. P. 26(a)(1)(A)(i)]**

Defendants identify the following individuals who may have discoverable information that Defendants may use to support their defenses in this case. Waymo<sup>1</sup> should contact any current or former employee, agent, or other representative of Defendants only through Defendants’ counsel of record, unless otherwise specified. Additionally, individuals described as having knowledge of the “Stroz due diligence for the Uber/Ottomotto acquisition” are noted with an asterisk (\*) because these individuals would be used to support Defendants’ defenses in this case, or would testify about that subject, if and only if that subject is found not to be privileged.

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<sup>1</sup> “Waymo” refers to Waymo LLC (previously Project Chauffeur), Google Inc., and Alphabet Inc.

Persons	Address	Knowledge
Travis Kalanick	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Defendants' business model and strategy for autonomous vehicles; Defendants' non-misappropriation of Waymo's trade secrets; Uber's decision to acquire Ottomotto; steps taken by Defendants to prevent trade secrets from prior employers coming to Defendants; Defendants' autonomous vehicle program; March 11, 2016 meeting with Anthony Levandowski; knowledge of Waymo's discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; Defendants' employment of Anthony Levandowski; Defendants' termination of Anthony Levandowski
Jeff Holden	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Defendants' business model and strategy for autonomous vehicles; Defendants' autonomous vehicle program; Uber's decision to acquire Ottomotto; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

Persons	Address	Knowledge
Anthony Levandowski	<p>Contact Mr. Levandowski's counsel:</p> <p>Ismail Ramsey or Miles Ehrlich  Ramsey &amp; Ehrlich LLP  803 Hearst Avenue  Berkeley, CA 94710</p>	<p>Nature of employment at Waymo and Defendants; design and development of Defendants' LiDAR; Defendants' autonomous vehicle program; Defendants' non-misappropriation of Waymo's trade secrets; the inventions disclosed and claimed in the '922 and '464 patents, including conception and reduction to practice; the preparation and filing of the '922 and '464 patents; business of Otto Trucking LLC; knowledge of Odin Wave LLC and Tyto LiDAR LLC; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; March 11, 2016 meeting with Anthony Levandowski; Stroz due diligence for the Uber/Ottomotto acquisition*</p>
Radu Raduta	<p>Contact Mr. Raduta's counsel:</p> <p>Mary McNamara  Swanson &amp; McNamara LLP  300 Montgomery Street, Suite 1100  San Francisco, CA 94104  Phone: (415) 477-3800  Fax: (415) 477-9010  Email: mary@smlp.law</p>	<p>Nature of employment at Waymo and Defendants; Defendants' non-misappropriation of Waymo's trade secrets</p>

Persons	Address	Knowledge
Sameer Kshirsagar	Contact Mr. Kshirsagar's counsel:  Mark Punzalan Punzalan Law, P.C. 600 Allerton Street, Suite 201 Redwood City, CA 94063 Phone: (650) 481-8112 Fax: (650) 362-4151 Email: markp@punzalanlaw.com	Nature of employment at Waymo and Defendants; Defendants' non-misappropriation of Waymo's trade secrets
James Haslim	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; knowledge of Odin Wave LLC and Tyto LiDAR LLC; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Adam Kenvarg	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order; inspection pursuant to the Court's provisional remedy order
William Treichler	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

Persons	Address	Knowledge
Florin Ignatescu	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Gaetan Pennecot	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; the inventions disclosed and claimed in the '922 and '464 patents, including conception and reduction to practice; the preparation and filing of the '922 and '464 patents; nature of employment at Waymo; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

Persons	Address	Knowledge
Daniel Gruver	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; the inventions disclosed and claimed in the '922 and '464 patents, including conception and reduction to practice; the preparation and filing of the '922 and '464 patents; nature of employment at Waymo; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Scott Boehmke	[Contact through counsel of record]  Uber Technologies, Inc. Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; inspection pursuant to the Court's provisional remedy order; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Jim Gasbarro	[Contact through counsel of record]  Uber Technologies, Inc. Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order



Persons	Address	Knowledge
Robert Doll	[Contact through counsel of record]  Uber Technologies, Inc. Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Eric Meyhofer	[Contact through counsel of record]  Uber Technologies, Inc. Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Design and development of Defendants' LiDAR; Defendants' autonomous vehicle program; Defendants' non-misappropriation of Waymo's trade secrets; Defendants' business model and strategy for autonomous vehicles; Uber's decision to acquire Ottomotto; termination of Anthony Levandowski; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
John Bares	[Contact through counsel of record]  Uber Technologies, Inc. Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Design and development of Defendants' LiDAR; Defendants' autonomous vehicle program; Defendants' non-misappropriation of Waymo's trade secrets; Defendants' business model and strategy for autonomous vehicles; Uber's decision to acquire Ottomotto; steps taken by Defendants to prevent trade secrets from prior employers of Defendants' employees coming to Defendants; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

Persons	Address	Knowledge
Asheem Linaval	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; Waymo's policies as it relates to contractors concerning confidential and trade secret information; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Michael Karasoff	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; knowledge of Odin Wave LLC and Tyto LiDAR LLC; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Matthew Palomar	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Daniel Ratner	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

Persons	Address	Knowledge
Max Levandowski	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
George Lagui	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

Persons	Address	Knowledge
Lior Ron	<p data-bbox="589 233 1049 268">[Contact through counsel of record]</p> <p data-bbox="589 310 948 426">Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103</p>	<p data-bbox="1146 233 1528 1440">Nature of employment at Waymo and Defendants; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; knowledge of the Project Chauffeur bonus program; steps taken by Defendants to prevent trade secrets from prior employers of Defendants' employees coming to Defendants; Defendants' non-misappropriation of Waymo's trade secrets; formation, purpose, and business of Otto Trucking LLC; formation, purpose, and business of Ottomotto; Ottomotto's decision to be acquired by Uber; March 11, 2016 meeting with Anthony Levandowski; Stroz due diligence for the Uber/Ottomotto acquisition*; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order</p>
Brent Schwarz	<p data-bbox="589 1461 1049 1497">[Contact through counsel of record]</p> <p data-bbox="589 1539 948 1654">Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103</p>	<p data-bbox="1146 1461 1511 1808">Defendants' non-misappropriation of Waymo's trade secrets; knowledge of Odin Wave LLC and Tyto LiDAR LLC; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order</p>

Persons	Address	Knowledge
Cameron Poetzscher	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Defendants' non-misappropriation of Waymo's trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; March 11, 2016 meeting with Anthony Levandowski; Stroz due diligence for the Uber/Ottomotto acquisition*; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Nina Qi	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Defendants' non-misappropriation of Waymo's trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; March 11, 2016 meeting with Anthony Levandowski; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Adam Bentley	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Formation, purpose, and business of Otto Trucking LLC; formation, purpose, and business of Ottomotto; Ottomotto's decision to be acquired by Defendants and structure of the acquisition; knowledge of Odin Wave LLC and Tyto LiDAR LLC; submissions to the Nevada Department of Motor Vehicles; Stroz due diligence for the Uber/Ottomotto acquisition*; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

Persons	Address	Knowledge
Ognen Stojanovski	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Knowledge of Odin Wave LLC, Tyto LiDAR LLC, and Sandstone Group LLC; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Rhian Morgan	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Hiring and onboarding process for Ottomotto, including hiring agreements; steps taken by Defendants to prevent trade secrets from prior employers of Defendants' employees coming to Defendants; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

Persons	Address	Knowledge
Don Burnette	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Nature of employment at Waymo and Defendants; Defendants' non-misappropriation of Waymo's trade secrets; formation, purpose, and business of Ottomotto; Ottomotto's decision to be acquired by Defendants; Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses; knowledge of the Project Chauffeur bonus program; Stroz due diligence for the Uber/Ottomotto acquisition*; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Soren Juelsgaard*	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Stroz due diligence for the Uber/Ottomotto acquisition*; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Colin Sebern*	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Stroz due diligence for the Uber/Ottomotto acquisition*; Defendants' non-misappropriation of Waymo's trade secrets; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

Persons	Address	Knowledge
Brian McClendon	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Development and operation of Waymo's autonomous vehicle program; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; knowledge of the Project Chauffeur bonus program; introduction of Anthony Levandowski to Defendants; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Justin Suhr	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Stroz due diligence for the Uber/Ottomotto acquisition*; Uber's decision to acquire Ottomotto and structure of the acquisition; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Angela Padilla	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Termination of Anthony Levandowski; Stroz due diligence for the Uber/Ottomotto acquisition*; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order



Persons	Address	Knowledge
Andrew Glickman	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Stroz due diligence for the Uber/Ottomotto acquisition*; Uber's decision to acquire Ottomotto and structure of the acquisition; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Eric Friedberg*	Stroz Friedberg 32 Avenue of the Americas, Floor 4 New York, NY 10013 Phone: (212) 981-6540	Stroz due diligence for the Uber/Ottomotto acquisition*
Mary Fulginiti*	Stroz Friedberg 1925 Century Park, East Suite 1350 Los Angeles, CA 90067 Phone: (310) 623-3300	Stroz due diligence for the Uber/Ottomotto acquisition*
Judith Branham*	Stroz Friedberg 330 Second Avenue South, Suite 335 Minneapolis, MN 55401 Phone: (612) 605-3000	Stroz due diligence for the Uber/Ottomotto acquisition*
Melanie Maugeri*	Stroz Friedberg 101 Montgomery Street, Suite 2200 San Francisco, CA 94104 Phone: (415) 671-4720	Stroz due diligence for the Uber/Ottomotto acquisition*
Eric Amdursky*	[Contact through O'Melveny and Myers LLP General Counsel]  Martin S. Checov O'Melveny & Myers LLP Two Embarcadero Center, 28th Floor San Francisco, CA 94111 Phone: (415) 984-8713	Stroz due diligence for the Uber/Ottomotto acquisition*
Paul Sieben*	[Contact through O'Melveny and Myers LLP General Counsel]  Martin S. Checov O'Melveny & Myers LLP Two Embarcadero Center, 28th Floor San Francisco, CA 94111 Phone: (415) 984-8713	Stroz due diligence for the Uber/Ottomotto acquisition*

Persons	Address	Knowledge
Eric Tate† <sup>2</sup>	Morrison & Foerster LLP 425 Market Street San Francisco, CA 94105 Phone: (415) 268-7000	Stroz due diligence for the Uber/Ottomotto acquisition*; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
Rudy Kim†	Morrison & Foerster LLP 755 Page Mill Road Palo Alto, CA 94304 Phone: (650) 813-5600	Intellectual property due diligence for the Uber/Ottomotto acquisition*; inspection pursuant to the Court's provisional remedy order
Shouvik Biswas*†	Morrison & Foerster LLP 1650 Tysons Boulevard, Suite 400 McLean, VA 22102 Phone: (703) 760-7700	Intellectual property due diligence for the Uber/Ottomotto acquisition*
Wendy Ray†	Morrison & Foerster LLP 707 Wilshire Boulevard Los Angeles, CA 90017-3543 Phone: (213) 892-5200	Confirmation of the absence of evidence of trade secret misappropriation; inspection pursuant to the Court's provisional remedy order
Daniel Muino†	Morrison & Foerster LLP 2000 Pennsylvania Avenue, NW Suite 6000 Washington, D.C. 20006 Phone: (202) 887-1500	Inspection pursuant to the Court's provisional remedy order
Esther Kim Chang†	Morrison & Foerster LLP 425 Market Street San Francisco, CA 94105 Phone: (415) 268-7000	Inspection pursuant to the Court's provisional remedy order
Sylvia Rivera†	Morrison & Foerster LLP 707 Wilshire Boulevard Los Angeles, CA 90017-3543 Phone: (213) 892-5200	Confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order

<sup>2</sup> In view of the rapid pace of this litigation and the Court's order requiring initial disclosures by June 21, 2017, Defendants are listing certain outside counsel as potential witnesses out of an abundance of caution. Such outside counsel are indicated with †. Defendants expect to resolve, through resolution of pending privilege issues and discussions with opposing counsel and the Court, whether any of these potential witnesses will in fact be called as witnesses at trial.

Persons	Address	Knowledge
Kevin Faulkner	Stroz Friedberg 32 Avenue of the Americas, Floor 4 New York, NY 10013 Phone: (212) 981-6540	Forensic examination of Uber-issued devices and data; confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order
John Krafcik	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; knowledge of the Project Chauffeur bonus program;
Pierre-Yves Droz	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Inventions disclosed and claimed in the '922, '464, and '936 patents, including conception and reduction to practice; the preparation and filing of the '922, '464, and '936 patents; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; the design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets.

Persons	Address	Knowledge
William McCann	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
Ben Ingram	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
Bernard Fidric	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
Luke Wachter	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
Dmitri Dolgov	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski

Persons	Address	Knowledge
Nathaniel Fairfield	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski
Andrew Chatham	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski
Rahim Pardhan	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
Blaise Gassend	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information

Persons	Address	Knowledge
Mark Shand	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski
Andrew Schultz	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
Ryan Andrade	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
Drew Ulrich	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Inventions disclosed and claimed in the '922 and '464 patents, including conception and reduction to practice; the preparation and filing of the '922 and '464 patents; Waymo's employee policies concerning confidential and trade secret information; the design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets

Persons	Address	Knowledge
Zachary Morris	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Inventions disclosed and claimed in the '922 and '464 patents, including conception and reduction to practice; the preparation and filing of the '922 and '464 patents; Waymo's employee policies concerning confidential and trade secret information; the design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets
Samuel Lenius	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Invention disclosed and claimed in the '936 patent, including conception and reduction to practice; the preparation and filing of the '936 patent; Waymo's employee policies concerning confidential and trade secret information; the design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets
Ionut Dorel Iordache	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets; Waymo's employee policies concerning confidential and trade secret information
Daniel Chu	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Estimates and forecasts of ride-sharing market and Waymo's share of ride-sharing market; Waymo's business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and profitability



Persons	Address	Knowledge
Gerard Dwyer	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Estimates and forecasts of ride-sharing market and Waymo's share of ride-sharing market; Waymo's business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and profitability
Jennifer Haroon	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Estimates and forecasts of ride-sharing market and Waymo's share of ride-sharing market; Waymo's business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and profitability
Joanne Chin	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski
Gary Brown	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's first awareness of alleged trade secret misappropriation; Waymo's forensic investigation into alleged misappropriation of trade secret misappropriation
Michael Janosko	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information



Persons	Address	Knowledge
Kristinn Gudjonsson	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; Waymo's forensic investigation into alleged misappropriation of trade secret misappropriation
Tim Willis	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's supply chain operations; Waymo's employee policies concerning confidential and trade secret information
Sean Noyce	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's supply chain operations; Waymo's employee policies concerning confidential and trade secret information
Jai Krishnan	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's supply chain operations; Waymo's employee policies concerning confidential and trade secret information
William Grossman	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's knowledge of Defendants' LiDAR design; Waymo's employee policies concerning confidential and trade secret information; Waymo's receipt of correspondence containing Defendants' LiDAR design
Ron Medford	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's filings, submissions, applications, or certifications made to public entities pertaining to its self-driving cars and the use of lasers in autonomous vehicles

Persons	Address	Knowledge
Waymo Human Resources Manager	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's policies concerning confidential and trade secret information; Waymo employment and compensation issues; Project Chauffeur bonus program
Chelsea Bailey	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's policies concerning confidential and trade secret information; Waymo employment and compensation issues; Project Chauffeur bonus program
Meiling Tan	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Marketing of Waymo's autonomous vehicle program; Waymo's business plans; Waymo's strategy regarding its business model with respect to self-driving car technology; Waymo's partnerships in the self-driving car space; Waymo's business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and profitability
Individuals most knowledgeable about Waymo's business, confidentiality policies, self-driving vehicle program, LiDAR systems, and employment and compensation policies and practices	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; the design, development, and operation of Waymo's LiDAR systems and purported trade secrets

Persons	Address	Knowledge
David Krane	Google Ventures 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space
David Lu	Google Ventures 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; Waymo's strategy regarding its business model with respect to self-driving car technology; Waymo's business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and profitability; Waymo's partnerships in the self-driving car space; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space

Persons	Address	Knowledge
Larry Page	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; knowledge of the Project Chauffeur bonus program;
Sergey Brin	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski
Eric Schmidt	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Development of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo
David Drummond	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Waymo's knowledge of Defendants' autonomous vehicle program; knowledge of Waymo's discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space.

Persons	Address	Knowledge
Chris Urmson	1777 Latham Street Mountain View, CA 94041	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; knowledge of the Project Chauffeur bonus program;
Bryan Salesky	Argo AI 40 24th Street Pittsburgh, PA 15222	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski

Persons	Address	Knowledge
Sebastian Thrun	Udacity, Inc. 2465 Latham Street Mountain View, CA 94040	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; knowledge of the Project Chauffeur bonus program; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski
Jiajun Zhu	Nuro, Inc. 435 N Whisman Road, Suite 100 Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski
Dave Ferguson	Nuro, Inc. 435 N Whisman Road, Suite 100 Mountain View, CA 94043	Development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's employee policies concerning confidential and trade secret information; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski

Persons	Address	Knowledge
Kyle Vogt	Cruise Automation 201 11th Street San Francisco, CA 94103	Public disclosure of Waymo's purported trade secrets
Employee of Velodyne LiDAR, Inc.	5521 Hellyer Avenue San Jose, CA 95138 (408) 465-2800	Public disclosure of Waymo's purported trade secrets
Employee of Quanergy Systems, Inc.	482 Mercury Drive Sunnyvale, CA 94085 (408) 245-9500	Public disclosure of Waymo's purported trade secrets
Employee of Cepton Technologies, Inc.	103 Bonaventura Drive San Jose, CA 95134	Public disclosure of Waymo's purported trade secrets
Employee of Innoviz Technologies Ltd.	15 Atir Yeda Street Kfar Saba, Israel 4464312 Email: info@innoviz.tech	Public disclosure of Waymo's purported trade secrets
Employee of Luminar Technologies, Inc.	495 Old Spanish Trail Portola Valley, CA 94028	Public disclosure of Waymo's purported trade secrets
Employee of Toyota Motor Sales, U.S.A., Inc.	19001 South Western Avenue Department WC11 Torrance, CA 90501 (310) 468-5084	Public disclosure of Waymo's purported trade secrets
Employee of Ford Motor Company	One American Road Dearborn, MI 48126 (313) 322-3000	Public disclosure of Waymo's purported trade secrets
Employee of BMW of North America, LLC	300 Chestnut Ridge Road Woodcliff Lake, NJ 07677-7731	Public disclosure of Waymo's purported trade secrets
Employee of Leddartech USA Inc.	1209 N. Orange Street Wilmington, DE 19801-1120	Public disclosure of Waymo's purported trade secrets
Employee of Phantom Intelligence Inc.	2740, Rue Einstein Québec, QC G1P 4S4 Canada (418) 650-6518	Public disclosure of Waymo's purported trade secrets
Employee of DENSO International America	24777 Denso Drive Southfield, MI 48086 (248) 350-7500	Public disclosure of Waymo's purported trade secrets
Employee of Continental Automotive, Inc.	18030 MacMillan Park Drive Fort Mill, SC 29707 (704) 583-8710	Public disclosure of Waymo's purported trade secrets



Persons	Address	Knowledge
Employee of Valeo Inc.	150 Stephenson Highway Troy, MI 48083 (248) 619-8300	Public disclosure of Waymo's purported trade secrets
Employee of Suteng Innovation Technology Co., Ltd.	Robosense Building, Block 1 South of Zhongguan Honghualing Industrial District No. 1213 Liuxian Avenue Taoyuan Street, Nanshan District Shenzhen, China Phone: 400 6325830 / 0755-86325830 Email: Service@sz-sti.com	Public disclosure of Waymo's purported trade secrets
Employee of Nalux Co., Ltd.	c/o Acme Agent, Inc. 41 S. High Street, Suite 2800 Columbus, OH 43215	Public disclosure of Waymo's purported trade secrets; communications and business transactions with Waymo or Defendants regarding the manufacture of the FAC lens; manufacture, availability, and use of FAC lenses
Employee of OSRAM Opto Semiconductors Inc.	1150 Kifer Road, Suite 100 Sunnyvale, CA 94086	Public disclosure of Waymo's purported trade secrets; communications and business transactions with Waymo or Defendants regarding the manufacture of the FAC lens; manufacture, availability, and use of FAC lenses; use and position of laser diodes on printed circuit boards
Employee of Gorilla Circuits	Gorilla Circuits c/o CT Corporation 818 W. 7th Street, Suite 930 Los Angeles, CA 90017	Communications and business transactions with Waymo or Defendants regarding components for LiDAR sensors; manufacture, availability, and use of such components



Persons	Address	Knowledge
Employee of Lyft, Inc.	185 Berry Street, Suite 500 San Francisco, CA 94107	Waymo's business plans; Waymo's strategy regarding its business model with respect to self-driving car technology; Waymo's partnerships in the self-driving car space; Waymo's business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and profitability
John Gardner	c/o Rogers Joseph O'Donnell 311 California Street, 10th Floor San Francisco, CA	Representation of Anthony Levandowski; knowledge of Odin Wave LLC, Tyto LiDAR LLC, and Sandstone Group LLC; Stroz due diligence for the Uber/Ottomotto acquisition*
Alisa Baker	Levine & Baker 340 Pine St Suite 300, San Francisco, CA 94104	Representation of Lior Ron; knowledge of Odin Wave LLC, Tyto LiDAR LLC, and Sandstone Group LLC; Stroz due diligence for the Uber/Ottomotto acquisition*
Jordan Jaffe†	Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 Phone: (415) 875-6600	Inspection pursuant to the Court's provisional remedy order
Felipe Corredor†	Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 Phone: (415) 875-6600	Inspection pursuant to the Court's provisional remedy order
Jeff Nardinelli†	Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 Phone: (415) 875-6600	Inspection pursuant to the Court's provisional remedy order

Persons	Address	Knowledge
John McCauley†	Quinn Emanuel Urquhart & Sullivan, LLP 50 California Street, 22nd Floor San Francisco, California 94111 Phone: (415) 875-6600	Inspection pursuant to the Court's provisional remedy order
Jared Newton†	Quinn Emanuel Urquhart & Sullivan, LLP 777 6th Street NW, 11th floor Washington, D.C. 20001 Phone: (202) 538-8000	Inspection pursuant to the Court's provisional remedy order

Defendants believe that Waymo's current and former employees and consultants are likely to have knowledge of: (1) the design and development of Waymo's LiDAR and purported trade secrets, including but not limited to failures to protect the confidentiality of such purported trade secrets; (2) the '922, '464, and '936 patents ("the Asserted Patents"); (3) Waymo's analyses or plans concerning the ride-sharing market, including projections for revenue generation and profitability; (4) Waymo's delay in bringing this lawsuit and motivations for litigating against Defendants; (5) Waymo's practice of allowing competing side businesses; and (6) lack of damages or irreparable harm to Waymo. The identities of all such individuals are known to Waymo but not to Defendants as of the date of this disclosure.<sup>3</sup> Defendants reserve the right to supplement this list as additional facts are disclosed in discovery.

Further, Defendants identify the following persons who may have knowledge of facts relevant to this suit:

1. Any custodian of records or other person who may be required to establish authenticity of documents;
2. Any and all persons identified by Waymo in its initial disclosures; and

<sup>3</sup> As set forth in Defendants' motion to compel (Dkt. 687), Waymo has refused to respond to interrogatories or produce documents fundamental to Defendants' defenses, which Uber needs to proceed with depositions. To date, Waymo has produced only 975 documents in response to Defendants' first and second sets of requests for production, consisting of 162 document requests. If and when Waymo fulfills its interrogatory response and document production obligations, Defendants will supplement these disclosures based on information not currently known to Defendants.

3. Any and all persons whose depositions are taken, who provide written testimony in this action, or who contribute to any response to the parties' discovery requests.

Additionally, Defendants have retained and intend to retain expert witnesses to testify on its defenses, including non-misappropriation of Waymo's alleged trade secrets; the culture, customs, and practices in the autonomous vehicle space; non-infringement; invalidity; forensic investigations to locate the allegedly downloaded files; and lack of damages.

**B. DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS [Fed. R. Civ. P. 26(a)(1)(A)(ii)]**

Defendants identify the following categories of documents, electronically stored information, and tangible things in its possession, custody, or control that it may use to support its defenses, unless solely for impeachment:

- Documents concerning Defendants' autonomous vehicle program;
- Documents concerning Defendants' design and development of LiDAR;
- Documents concerning Defendants' efforts to commercialize autonomous vehicle technology;
- Drawings or photographs of Defendants' LiDAR;
- Prototypes (or components of prototypes) of Defendants' LiDAR;
- Documents concerning Defendants' hiring process, including hiring agreements;
- Documents concerning Uber's acquisition of Ottomotto;
- The Asserted Patents, their prosecution histories, and prior art to the Asserted Patents;
- Documents in the public domain relating to Waymo's purported trade secrets;
- Documents concerning third-party suppliers of LiDAR components; and
- Waymo's filings, submissions, applications, or certifications made to public entities pertaining to the use of lasers in autonomous vehicles.

To the extent the above-identified documents are within the possession, custody, or control of Defendants, such documents are generally located at Defendants' offices at 1455 Market Street, San Francisco, CA 94103.

Defendants' search for documents is ongoing, and Defendants reserve the right to

1 supplement this disclosure under Federal Rule of Civil Procedure 26(e)(1). Defendants may also  
2 rely on documents produced by any party and third party to this litigation, including Defendants  
3 themselves and Waymo.

4 Defendants reserve the right to object to the production of any documents described herein  
5 on any basis permitted by the Federal Rules of Civil Procedure.

6 **C. COMPUTATION OF DAMAGES [Fed. R. Civ. P. 26(a)(1)(A)(iii)]**

7 Pursuant to Fed. R. Civ. P. 26(a)(1)(C), Defendants may seek attorneys' fees and costs in  
8 defending this action, but are unable at this time to estimate the amount.

9 **D. INSURANCE AGREEMENTS [Fed. R. Civ. P. 26(a)(1)(A)(iv)]**

10 Defendants are currently unaware of any insurance contracts applicable to any claim in  
11 this action.

12 **CERTIFICATION**

13 To the best of my knowledge, information and belief, formed after an inquiry that is  
14 reasonable under the circumstances, this disclosure is complete and correct as of the date set forth  
15 below.

16  
17 Dated: June 21, 2017

MORRISON & FOERSTER LLP

18  
19 By: /s/ Michael A. Jacobs

MICHAEL A. JACOBS

20 Attorneys for Defendants  
21 UBER TECHNOLOGIES, INC.  
22 and OTTOMOTTO LLC  
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